REMARKS

Claims 1, 3, 4, and 8-13 have been amended, and claims 2 has been canceled without prejudice or disclaimer. Claims 1 and 3-23 are pending, with claims 1, 14, and 18 being independent. No new matter is presented in this Amendment.

Amendments to Claims and Entry of Amendment After Final Rejection

Independent claim 1 has been amended to recite the feature "wherein the reading the language information comprises: opening a startup file first read when the interactive mode is selected; and reading the language information" previously recited in original dependent claim 2, which depended from claim 1 and has now been canceled, and the feature "reading language information from a startup file" previously recited in original independent claim 14, which has not been amended, such that independent claim 1 now recites the feature "wherein the reading the language information comprises: opening a startup file first read when the interactive mode is selected; and reading the language information from the startup file." Claims 3, 4, and 8-13 have been amended to be consistent with the changes made to claim 1. Since the Examiner has already considered this feature now recited in claim 1 as a result of having considered original claims 2 and 14 in the Office Action of September 28, 2006, and the Final Office Action of April 5, 2007, it is submitted that the amendment of claim 1 to include this feature in this Amendment After Final Rejection does not raise new issues requiring further consideration and/or search. Accordingly, it is submitted that entry of this Amendment After Final Rejection is proper under 37 CFR 1.116(b) and MPEP 714.12 and 714.13.

Claim Rejections under 35 USC 102

Rejection 1

Claims 1-4, 6-12, 14, 16, and 17 stand rejected under 35 USC 102(e) as being anticipated by Tsumagari et al. (Tsumagari) (U.S. Patent Application Publication No. 2003/0161615). Claim 2 has been canceled. The rejection of claims 1, 3, 4, 6-12, 14, 16, and 17 is respectfully traversed.

Claim 1

Independent claim 1 recites the feature "reading language information indicating a language used with contents contained in interactive data." The Examiner considers this feature to be disclosed in paragraph [0112] of Tsumagari, which reads as follows:

> [0112] <C> Processor 320 interprets the contents (indicating the current audio language, if the disc playback operation is now being done, and so forth) of a "DVD status signal" which is sent from DVD-Video playback engine 200 and indicates the property of DVD-Video player 100, and converts the contents of the interpreted DVD status signal into a corresponding property signal specified in ENAV contents 30 (30W) (e.g., converts a DVD status signal which indicates that the current audio language is Japanese into a property signal that designates Japanese as a language used by ENAV).

On page 16 of the Final Office Action of April 5, 2007, the Examiner states that "[i]t is noted that the language information equates to *indicating the audio language([0112]); and the* interactive data equates to *DVD status signal ([0112])*." However, it is not understood what the Examiner means by "*the* interactive data equates to *DVD status signal ([0112])*," and it is respectfully requested that the Examiner explain what this means in the next Office Action, even if that Office Action is an Advisory Action.

Furthermore, the Examiner has not explained where paragraph [0112] of Tsumagari discloses "reading language information" as recited in claim 1, and it is respectfully requested that the Examiner explain where paragraph [0112] of Tsumagari discloses this feature in the next Office Action, even if that Office Action is an Advisory Action.

Furthermore, it is submitted that Tsumagari does not disclose or suggest the feature "wherein the reading the language information comprises: opening a startup file first read when the interactive mode is selected; and reading the language information from the startup file" now recited in claim 1 and previously recited in dependent claim 2 and independent claim 14 as discussed above under the heading "Amendments to Claims and Entry of Amendment After Final Rejection."

On page 17 of the Final Office Action of April 5, 2007, the Examiner states as follows with respect to the feature "wherein the reading the language information comprises: opening a

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startup file first read when the interactive mode is selected; and reading the language information" now recited in claim 1 and previously recited in claim 2:

> **d.** Tsumagari teaches **the reading the language information comprises opening a startup file first read when the interactive mode is selected and reading the language information (Claim 2)** as *XHTML document for start-up may be recorded under DVD_ENAV directory on a disc ([0381]).*

On page 23 of the Final Office Action of April 5, 2007, the Examiner states as follows with respect to the feature "reading the language information from the startup file" now recited in claim 1 and previously recited in claim 14:

> **o.** Tsumagari teaches **reading language information form** [*sic*] **a startup file on the optical disc (Claim 14)** as a startup file corresponds to *at least DVDINDEX.HTM file, XHTML document for start-up may be recorded under DVD_ENAV directory on a disc ([0381]).*

Paragraph [0381] of Tsumagari referred to by the Examiner reads as follows:

> **[0381]** ENAV content can exist not only in a disc but in a server. But, at least DVDINDEX.HTM file, XHTML document for start-up may be recorded under DVD_ENAV directory on a disc. Also, Files of ENAV content are delivered from a server via Internet after authorization between an Enhanced DVD player and the server by means of the disc ID of Enhanced DVD disc and/or player ID of Enhanced DVD player. After the completion of authorization, if an Enhanced DVD disc is ejected, deliver of ENAV content from the server can be stopped and/or the playback of ENAV content can be stopped.

The only other portion of Tsumagari that refers to the DVDINDEX.HTM file is paragraph [0387] of Tsumagari, which reads as follows:

> **[0387]** In Enhanced Navigation mode, a player may ignore FP_PGC and may play back DVDINDEX.HTM file for startup in ENAV content on a disc firstly, and then plays back according to the instruction of ENAV content.

However, Tsumagari does <u>not</u> explain what kind of information is contained in the DVDINDEX.HTM file that the Examiner considers to be "a startup file" as now recited in claim 1, and it is submitted that nothing <u>whatsoever</u> in Tsumagari discloses or suggests that the DVDINDEX.HTM file contains "language information" of <u>any</u> kind, let alone "language

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information indicating a language used with contents contained in interactive data" as recited in claim 1. Nor has the Examiner explained <u>why</u> she considers Tsumagari's DVDINDEX.HTM file to contain such "language information."

Accordingly, for at least the foregoing reasons, it is submitted that Tsumagari does <u>not</u> disclose or suggest "reading language information <u>indicating a language used with contents contained in interactive data</u>" as recited in claim 1 in combination with the feature "wherein the reading the language information comprises: opening a startup file first read when the interactive mode is selected; and <u>reading the language information from the startup file</u>" now recited in claim 1 and previously recited in dependent claim 2 and independent claim 14.

Claim 3

It is submitted that Tsumagari does <u>not</u> disclose or suggest the feature "wherein the reading the language information from the startup file comprises reading language information recorded using an element linking a loading information file included in a corresponding enhanced audio visual (ENAV) application, from the startup file" recited in dependent claim 3.

On page 17 of the Final Office Action of April 5, 2007, the Examiner states as follows with respect to claim 3:

> e. Tsumagari teaches **reading language information recorded using an element linking a loading information file included in a corresponding enhanced audio visual (ENAV) application, from a startup file (Claim 3)** as an element linking a loading information file included in a corresponding enhanced audio visual application *which are acquired from the Internet or the like are downloaded to player 100 as ENAV contents 30W ([0086])*.

Paragraph [0086] of Tsumagari referred to by the Examiner read as follows:

> **[0086]** Disc 1 to be played back by player 100 in FIG. 1 records DVD-Video contents 10 having an MPEG2 program stream structure, and ENAV contents 30 that contain information (video information such as a moving image, still image, animation, and the like, audio information, text information, and the like) other than the MPEG2 program stream structure. Web contents such as video information, audio information, text information, and the like, which are acquired from the Internet or the like are downloaded to player 100 as ENAV contents 30W.

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However, it is submitted that paragraph [0086] of Tsumagari does not disclose or suggest that the ENAV contents 30W referred to by the Examiner includes "a loading information file" as recited in claim 3, and does not disclose or suggest "reading language information recorded using an element linking a loading information file . . . from the startup file" as recited in claim 3, especially since Tsumagari does not explain what kind of information is contained in the DVDINDEX.HTM file that the Examiner considers to correspond to "the startup file" recited in claim 3. Nor has the Examiner explained why she considers paragraph [0086] of Tsumagari to disclose these features of claim 3, or what element in Tsumagari allegedly corresponds to the "element linking a loading information file" recited in claim 3.

Claim 4

It is submitted that Tsumagari does not disclose or suggest the feature "wherein the reading the language information from the startup file comprises reading language information indicating respectively the language used in a plurality of ENAV applications, each of which includes substantially similar contents and is made with a different language from the other ENAV applications, in order to reproduce AV data in the interactive mode, from the startup file" recited in dependent claim 4.

On pages 17 and 18 of the Final Office Action of April 5, 2007, the Examiner states as follows with respect to claim 4:

> **f.** Tsumagari teaches **the reading the language information comprises reading language information indicating respectively the language used in a plurality of** ENAV **applications, each of which includes substantially similar contents and is made with a different language from the other** ENAV **applications, in order to reproduce AV data in the interactive mode (Claim 4)** as respectively the language used in a plurality of ENAV applications equates to *property signal that designates Japanese as a language used by* ENAV *([0112])*. Note that ENAV application corresponds to *DVD_ENAV directory on a disc ([0381])*, ENAV *contents 30 ([0086]) and* ENAV *contents 30W ([0086])*.

However, although paragraph [0112] referred to by the Examiner does refer to "a property signal that designates Japanese as a language used by ENAV)" as indicated by the Examiner, it is submitted paragraphs [0086], [0112], and [0381] of Tsumagari referred to by the Examiner do

not disclose or suggest "a plurality of ENAV applications, each of which includes substantially similar contents and is made with a different language from the other ENAV applications" as recited in claim 4, or "reading language information indicating respectively the language used in [such] a plurality of ENAV applications" as recited in claim 4. Nor has the Examiner explained why she considers paragraphs [0086], [0112], and [0381] of Tsumagari to disclose these features of claim 4.

Claim 6

It is submitted that Tsumagari does not disclose or suggest the feature "wherein the selecting and reading interactive data comprises finding a system parameter SPRM 0 as player language information that is set according to a DVD-Video standard in the reproducing apparatus" recited in dependent claim 6.

On page 18 of the Final Office Action of April 5, 2007, the Examiner states as follows with respect to claim 6:

> g. Tsumagari teaches **finding a system parameter SPRM 0 as player language information that is set according to a DVD-Video standard in the reproducing apparatus (Claim 6)** as player language information that is set according to a DVD-Video standard equates *an audio language, sub-picture caption language ([0091])*.

However, it is submitted that paragraph [0091] of Tsumagari referred to by the Examiner does not disclose or suggest that Tsumagari's audio language and sub-picture caption language are obtained by "finding a system parameter SPRM 0 as player language information" as recited in claim 6. Nor has the Examiner explained why she considers paragraph [0091] of Tsumagari to disclose this feature, or what element in Tsumagari allegedly corresponds to the "system parameter SPRM 0" recited in claim 6.

Claim 7

It is submitted that Tsumagari does not disclose or suggest the feature "wherein the selecting and reading the interactive data comprises reading ENAV files belonging to the corresponding ENAV application with reference to a loading information file informing location

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information of the ENAV files belonging to the corresponding ENAV application" recited in dependent claim 7.

In explaining the rejection of claim 7 on page 18 of the Final Office Action of April 5, 2007, the Examiner states that Tsumagari teaches that "ENAV files correspond to *DVD-Video contents 10 ([0086])*," and that "ENAV application corresponds to *DVD_ENAV directory on a disc ([0381]), ENAV contents 30 ([0086]) and ENAV contents 30W ([0086])*.

However, it is submitted that paragraphs [0086] and [0381] of Tsumagari referred to by the Examiner do <u>not</u> disclose or suggest "a loading information file informing location information of the ENAV files belonging to the corresponding ENAV application" as recited in claim 7. Nor has the Examiner explained <u>why</u> she considers paragraphs [0086] and [0381] of Tsumagari to disclose this feature of claim 7. Furthermore, although paragraph [0381] of Tsumagari states that "at least DVDINDEX.HTM file, XHTML document for start-up may be recorded under DVD_ENAV directory on a disc," Tsumagari does <u>not</u> explain what kind of information is contained in the DVDINDEX.HTM file, or what other kind of information, if any, is contained in the DVD-ENAV directory.

Claim 8

It is submitted that Tsumagari does not disclose or suggest the feature "wherein the reading the language information further comprises comparing the language information with the player language information and selecting one among a plurality of ENAV applications" recited in dependent claim 8.

In explaining the rejection of claim 8 on pages 18 and 19 of the Final Office Action of April 5, 2007, the Examiner states that "selecting one among a plurality of ENAV applications equates to *which are acquired from the Internet or the like are downloaded to player 100 as ENAV contents 30W ([0086])*. However, it is submitted that Tsumagari does <u>not</u> disclose or suggest that the ENAV contents 30W referred to by the Examiner are "a plurality of ENAV applications" as recited in claim 8, as opposed to, for example, a <u>single</u> ENAV application. Nor has the Examiner explained <u>why</u> she considers Tsumagari's ENAV contents 30W to be "a plurality of ENAV applications" as recited in claim 8.

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Claim 9

It is submitted that Tsumagari does <u>not</u> disclose or suggest the feature "wherein the reading the language information further comprises parsing the language information recorded using the element linking the loading information file included in the corresponding ENAV application" recited in dependent claim 9.

Although the Examiner provides a detailed explanation of the rejection of claim 9 on pages 19 and 20 of the Final Office Action of April 5, 2007, the Examiner does <u>not</u> explain where Tsumagari discloses or suggests "the element linking the loading information file" recited in claim 9. The Examiner states that "information file corresponds to *reads the ENAV playback information ([0073])*." Although paragraph [0073] of Tsumagari referred to by the Examiner states that "the DVD-Video player (FIG. 1) according to an embodiment of the present invention preferably reads the ENAV playback information prior to the ENAV contents data body," it is submitted that Tsumagari does <u>not</u> disclose or suggest anything <u>whatosever</u> that may be considered to be an "element linking the loading information file" as recited in claim 9.

Claim 10

It is submitted that Tsumagari does <u>not</u> disclose or suggest the feature "wherein the reading the language information further comprises parsing the language information recorded in an element that stores a condition selecting a linked loading information file, included in the element linking the loading information file" recited in dependent claim 10.

Although the Examiner provides a detailed explanation of the rejection of claim 10 on pages 20 and 21 of the Final Office Action of April 5, 2007, the Examiner does <u>not</u> explain where Tsumagari discloses or suggests "an element that stores a condition selecting a linked loading information file, included in the element linking the loading information file" as recited in claim 11. The Examiner states that "information file corresponds to *reads the ENAV playback information ([0073])*." Although paragraph [0073] of Tsumagari referred to by the Examiner states that "the DVD-Video player (FIG. 1) according to an embodiment of the present invention preferably reads the ENAV playback information prior to the ENAV contents data body," it is submitted that Tsumagari does <u>not</u> disclose or suggest anything <u>whatosever</u> that may be considered to be an

"an element that stores a condition selecting a linked loading information file, included in the element linking the loading information file" as recited in claim 10.

Claim 11

It is submitted that Tsumagari does not disclose or suggest the feature "wherein the reading the language information further comprises parsing the language information recorded using a 'name' property and a 'value' property in an element that stores a condition selecting a linked loading information file, included in the element linking the loading information file" recited in dependent claim 11.

Although the Examiner provides a detailed explanation of the rejection of claim 11 on page 21 of the Final Office Action of April 5, 2007, the Examiner does not explain where Tsumagari discloses or suggests "an element that stores a condition selecting a linked loading information file, included in the element linking the loading information file" as recited in claim 11. The Examiner states that "[n]ame property corresponds to *an audio language, sub-picture caption language ([0091])*;" that "[v]alue property corresponds to *time information ([0091])*;" and that "[v]alue property corresponds to *values in Property ([0046])*," although it is noted that "values in Property" referred to by the Examiner appears in paragraph [0406] of Tsumagari, rather than paragraph [0046] as indicated by the Examiner. However, it is submitted that Tsumagari does not disclose or suggest that "language information" as recited in claim 11 is recorded using the "audio language, sub-picture caption language" and "time information" referred to in paragraph [0091] and the "values in Property" referred to in paragraph [0406], such that Tsumagari does not disclose or suggest "language information recorded using a 'name' property and a 'value' property" as recited in claim 11. Furthermore, it is submitted that Tsumagari does not disclose or suggest "an element that stores a condition selecting a linked loading information file, included in the element linking the loading information file" as recited in claim 11.

Claim 12

It is submitted that Tsumagari does not disclose or suggest the feature "wherein the reading the language information further comprises parsing the language information recorded

using a 'name' property and a 'value' property in the element linking the loading information file" recited in dependent claim 12.

Although the Examiner provides a detailed explanation of the rejection of claim 12 on page 22 of the Final Office Action of April 5, 2007, the Examiner does not explain where Tsumagari discloses or suggests an "element linking the loading information file" as recited in claim 12. The Examiner states that "name property corresponds to *an audio language, sub-picture caption language ([0091])*," and that "value property corresponds to *time information ([0091], and values in Property ([0406])*. However, it is submitted that Tsumagari does not disclose or suggest that "language information" as recited in claim 12 is recorded using the "audio language, sub-picture caption language" and "time information" referred to in paragraph [0091] and the "values in Property" referred to in paragraph [0406], such that Tsumagari does not disclose or suggest "language information recorded using a 'name' property and a 'value' property" as recited in claim 12. Furthermore, it is submitted that Tsumagari does not disclose or suggest an "element linking the loading information file" as recited in claim 12.

Claim 14

It is submitted that Tsumagari does not disclose or suggest "reading language information from a startup file on the optical disk" as recited in independent claim 14 for at least the same reasons discussed above that Tsumagari does not disclose or suggest the similar feature "reading the language information from the startup file" recited in claim 1.

In addressing the feature "selecting ENAV data based on the read language information" recited in claim 14 in the explanation of claim 14 on pages 22 and 23 of the Final Office Action of April 5, 2007, the Examiner states that "Tsumagari teaches **selecting** ENAV **data based on the read language information (Claim 14)** as ENAV data corresponds to *player ID of Enhanced DVD player ([0065])*. However, the phrase "player ID of Enhanced DVD player" referred to by the Examiner appears in paragraph [0381] of Tsumagari, rather than in paragraph [0065] as indicated by the Examiner. Paragraph [0381] of Tsumagari reads as follows:

> **[0381]** ENAV content can exist not only in a disc but in a server.
> But, at least DVDINDEX.HTM file, XHTML document for start-up
> may be recorded under DVD_ENAV directory on a disc. Also,
> Files of ENAV content are delivered from a server via Internet after

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authorization between an Enhanced DVD player and the server by
means of the disc ID of Enhanced DVD disc and/or player ID of
Enhanced DVD player. After the completion of authorization, if an
Enhanced DVD disc is ejected, deliver of ENAV content from the
server can be stopped and/or the playback of ENAV content can
be stopped.

However, it is not seen where this paragraph of Tsumagari discloses or suggests
"selecting ENAV data based on the read language information" as recited in claim 14. Nor has
the Examiner explained why she considers this paragraph of Tsumagari to disclose or suggest
this feature of claim 14.

Claim 17

It is submitted that Tsumagari does not disclose the feature "wherein the reproducing
comprises reproducing corresponding audio visual data from the optical disk together with the
selected ENAV data in a non interactive mode" recited in dependent claim 17.

In explaining the rejection of claim 17 on page 7 of the Final Office Action of April 5,
2007, the Examiner states as follows:

> **As per claim 17,** Tsumagari teaches the method of claim
> 14, wherein the reproducing comprises reproducing corresponding
> audio visual data from the optical disk together with the selected
> ENAV data in a non interactive mode *([0073, 0086, 0091, 0112,
> 0113, 0381, 0382, 0383, 0406])*.

However, it is submitted that paragraphs [0073], [0086], [0091], [0112], [0113], [0381],
[0382], [0383], [0406] of Tsumagari referred to by the Examiner do not disclose or suggest
"reproducing corresponding audio visual data from the optical disk together with the selected
ENAV data in a non interactive mode" as recited in claim 17. Nor has the Examiner explained
why she considers these paragraphs of Tsumagari to disclose or suggest this feature of claim
17.

In the previous Office Action of September 28, 2006, the Examiner took the position that
this feature of claim 17 is disclosed in paragraphs [0421] and [0445] of Tsumagari. However, as
pointed out on pages 13 and 14 of the Amendment of December 28, 2006, these paragraphs do
not disclose anything whatsoever about "reproducing corresponding audio visual data from the
optical disk together with the selected ENAV data in a non interactive mode" as recited in

dependent claim 17. Paragraph [0445] discloses an off-line mode M1 which is a <u>non-interactive</u> mode in which <u>only DVD-Video contents</u> are reproduced, an on-line mode M2 which is an <u>interactive</u> mode in which <u>only ENAV contents</u> are reproduced, and a mixed mode M3 which is an <u>interactive</u> mode in which <u>DVD-Video contents and ENAV content</u>s are reproduced.

<u>Conclusion—Rejection 1</u>

For at least the reasons discussed above, it is respectfully requested that the rejection of claims 1, 2, 4, 6-12, 14, 16, and 17 (i.e., claims 1, 2, 4, 6-12, 14, and 17 discussed above and claim 16 depending from claim 14) under 35 USC 102(e) as being anticipated by Tsumagari be <u>withdrawn</u>.

<u>Rejection 2</u>

Claims 18-22 stand rejected under 35 USC 102(e) as being anticipated by Tozaki et al. (Tozaki) (U.S. Patent No. 6,741,797). This rejection is respectfully traversed.

It is submitted that Tozaki does <u>not</u> disclose or suggest "[a] method of reproducing audio-visual data <u>in an interactive mode supported by interactive data</u> associated with the audio-visual data" as recited in independent claim 18. The Examiner did not even <u>address</u> this feature of claim 18 in explaining the rejection of claim 18 on pages 7 and 8 of the Final Office Action of April 5, 2007. Rather, the Examiner merely alleged that "Tozaki teaches a method of reproducing . . . audio-visual data <u>active data</u> associated with the audio-visual data" in the paragraph bridging pages 7 and 8 of the Final Office Action of April 5, 2007. However, this is <u>not</u> what is recited in claim 18. It is submitted that Tozaki merely discloses a standard method of reproducing DVD data in a <u>non-interactive</u> mode, rather than "[a] method of reproducing audio-visual data <u>in an interactive mode supported by interactive data</u> associated with the audio-visual data" as recited in claim 18.

It is submitted that Tozaki does <u>not</u> disclose or suggest "a plurality of interactive data respectively corresponding to a plurality of different natural languages" as recited in claim 18. The Examiner considers the "video information and audio information" referred to in column 18, lines 30-35, of Tozaki to be "audio-visual data" as recited in claim 18. The Examiner considers "the audio or sub picture information" referred to in column 19, line 53, through column 20, line

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20, of Tozaki, which may be "in a plurality of different languages" as described in column 19, line 53, through column 20, line 20, of Tozaki, to be "a plurality of interactive data respectively corresponding to a plurality of different natural languages" as recited in claim 18. However, the Examiner has not explained why she considers this to be the case.

It is submitted that Tozaki's "audio . . . information," which may be "in a plurality of different languages," is merely part of Tozaki's "audio information," and thus is not "a plurality of interactive data respectively corresponding to a plurality of different natural languages" as recited in claim 18. Furthermore, according to column 10, lines 24-26, of Tozaki, Tozaki's "sub picture information," which may be "in a plurality of different languages," is "information of a sub picture such as a subtitle of a movie etc.," and thus is merely data that can be displayed, rather than being "a plurality of interactive data respectively corresponding to a plurality of different natural languages" as recited in claim 18.

It is submitted that Tozaki does not disclose or suggest "reading language information specifying the plurality of different natural languages of the plurality of interactive data" as recited in claim 18.

The Examiner considers this feature of claim 18 to be disclosed in column 16, lines 21-26, of Tozaki, which states that "the audio voices and captions (titles) in a plurality of kinds of languages corresponding to this one movie can be recorded on a single optical disk," and column 19, line 53, through column 20, line 20, of Tozaki, which states that "a plurality of different languages are included as the audio or sub picture information." However, it is submitted that these portions of Tozaki do not disclose or suggest "reading language information specifying the plurality of different natural languages of the plurality of interactive data" as recited in claim 18. Nor has the Examiner explained why she considers these portions of Tozaki to disclose or suggest this feature of claim 18.

It is submitted that Tozaki does not disclose or suggest "interpreting and executing the read one of the plurality of interactive data" as recited in claim 18.

The Examiner considers this feature of claim 18 to be disclosed in column 19, line 53, to column 20, line 20, of Tozaki, which states that "a desirable language is selected for the audio or sub picture information by a stream selection signal Slc from the system controller 100, so that the audio or sub picture information in the desirable language is outputted to the audio buffer 92 or the sub picture buffer 89." However, this passage of Tozaki merely discloses outputting the

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selected audio or sub picture information in the desirable language, not "interpreting and executing" as recited in claim 18. Nor has the Examiner why she considers this portion of Tozaki to disclose or suggest this feature of claim 18. It is submitted that there is no need to "interpret and execute" Tozaki's selected audio or sub picture information in the desirable language because the audio or sub picture information is not "interactive data" as recited in claim 18 for the reasons discussed above.

For at least the foregoing reasons, it is respectfully requested that the rejection of claims 18-22 (i.e., claim 18 discussed above and claims 19-22 depending therefrom) under 35 USC 102(e) as being anticipated by Tozaki be withdrawn.

Claim Rejections under 35 USC 103

Rejection 1

Claims 5, 13, and 15 stand rejected under 35 USC 103(a) as being unpatentable over Tsumagari in view of Kou (U.S. Patent No. 6,661,466). This rejection is respectfully traversed.

Although the propriety of this rejection is not conceded, it is submitted that claims 5, 13, 15 are patentable over Tsumagari and Kou at least for the same reasons discussed above that claims 1, 3, and 14 from which claims 5, 13, and 15 directly or indirectly depend are patentable over Tsumagari. Accordingly, it is respectfully requested that the rejection of claims 5, 13, and 15 under 35 USC 103(a) as being unpatentable over Tsumagari in view of Kou be withdrawn.

Rejection 2

Claim 23 stands rejected under 35 USC 103(a) as being unpatentable over Tozaki in view of LaChapelle et al. (LaChapelle) (U.S. Patent No. 7,054,888). This rejection is respectfully traversed.

As recognized by the Examiner, Tozaki does not disclose "a plurality of loading files respectively corresponding to the plurality of different natural languages of the plurality of interactive data, each of the loading files specifying an interactive data file corresponding to a respective one of the plurality of different natural languages; and a startup file listing the plurality

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of loading files in association with the language information identifying the plurality of different natural languages of the plurality of interactive data" as recited in dependent claim 23.

However, the Examiner considers LaChapelle to disclose these features of claim 23, primarily in the "Multiple Languages" section in column 15, line 55, through column 16, line 20, of LaChapelle, and is of the opinion that it would have been obvious to incorporate these features into Tozaki's system "in order to identify the audio, video or image files on the media and any relevant information about each file in view of LaChapelle *(col. 2, lines 6-28)*, as doing so would give the added benefit of providing a software to reduce lengthy startup time significantly, as the media player only needs to load the metadata cache file to begin playback and does not need to first scan all the files on the medium as taught by LaChapelle *(col. 2, lines 6-28)*.

However, the advantages provided by LaChapelle's system identified as motivation for the combination of Tozaki and LaChapelle proposed by the Examiner have nothing <u>whatsoever</u> to do with the "plurality of different natural languages" features disclosed in the "Multiple Languages" section in column 15, line 55, through column 16, line 20, of LaChapelle. Furthermore, Tozaki's system is a standard DVD system, and the Examiner has <u>not</u> explained how it would be possible to modify Tozaki's system "to identify the audio, video or image files on the media and any relevant information about each file" as would be required to incorporate LaChapelle's features into Tozaki's system, or why one of ordinary skill in the art would want to do this since a DVD system does <u>not</u> "first scan all the files on the medium," which is what LaChapelle's system is designed to eliminate.

Furthermore, according to column 15, lines 56 and 57, of LaChapelle, "[t]he invention software supports multiple languages of menu and text data on a single storage media." However, Tozaki's "audio or sub picture information," which may be "in a plurality of different languages," which the Examiner considers to be "a plurality of interactive data respectively corresponding to a plurality of different natural languages" as recited in claim 18 from which claim 23 depends, is <u>already</u> in a plurality of different languages, and it is <u>not</u> seen how LaChapelle's "multiple languages of menu and text data" could be used with Tozaki's "audio or sub picture information." Nor has the Examiner explained how this might be done, or identified any reason why one of ordinary skill in the art would want to do this.

For at least the foregoing reasons, it is respectfully requested that the rejection of claim 23 under 35 USC 103(a) as being unpatentable over Tozaki in view of LaChapelle be <u>withdrawn</u>.

Conclusion

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.
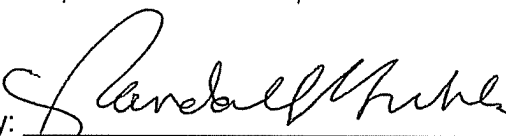
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with the filing of this paper, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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